

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

LUFKIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case No. 9:18CR13
	§	Judge Ron Clark
JOEL RUEBEN LAMBRIGHT JR.	§	

**ELEMENTS OF THE OFFENSE**

You are charged in Count One of the indictment with a violation of 26 U.S.C.  
§5861(d), Possession of an Unregistered Destructive Device.

The essential elements which must be proven to establish the violation are:

1. The defendant knowingly received or possessed a firearm;
2. The firearm was a destructive device manufactured through the use of chemicals and a combination of parts intended for use in converting a readily assembled explosive;
3. The firearm was and could readily have been put in operating condition;
4. The firearm was not registered to the defendant in the National Firearms Registration and Transfer Record; and
5. The defendant committed the offense in the EDTX.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY  
/s/ Tommy L. Coleman

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was delivered by electronic delivery to defendant's attorney, John Dale McElroy, on the 24th of May, 2018.

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Tommy L. Coleman